

3. Upon information and belief, the amount in controversy exceeds \$75,000, exclusive of interest in costs.

4. Plaintiff is citizen of Kentucky.

5. Pursuant to *Cosgrove v. Bartolotta*, 150 F.3d 729, 731 (7th Cir. 1998), “the citizenship of an LLC for purposes of the diversity jurisdiction is the citizenship of its members.” Pursuant to 28 U.S.C. § 1332 (c)(1), a corporation shall be deemed a citizen of its state of incorporation and the state where it has its principal place of business.

6. Upon information and belief, Caesars Riverboat Casino, LLC is wholly owned by and has as its sole member Roman Holding Company of Indiana, LLC. Roman Holding Company of Indiana, LLC is wholly owned by and has as its sole member Caesars World, LLC. Caesars World, LLC is wholly owned by and has as its sole member CEOC, LLC. CEOC, LLC is wholly owned by and has as its sole member Caesars Resort Collection, LLC. Caesars Resort Collection, LLC is wholly owned by and has as its sole member Caesars Growth Partners, LLC. Caesars Growth Partners, LLC is wholly owned by and has as its sole member Caesars Holdings, Inc. Caesars Holdings, Inc. is incorporated in Delaware and has its principal place of business in the State of Nevada. Therefore, Caesars Riverboat Casino, LLC is a citizen of Delaware and Nevada.

7. Upon information and belief, Caesars Enterprise Services, LLC has as its parent company, Caesars Entertainment, Inc. Caesars Entertainment, Inc. is incorporated in Delaware and has its principal place of business in the State of Nevada. Therefore, Caesars Entertainment, Inc. is a citizen of Delaware and Nevada.

8. This action arises from an incident that occurred on January 1, 2020. The Complaint alleges that Plaintiff was injured in a slip and fall at a property owned and operated by Caesars.

9. This action is removable to this District Court pursuant to 28 U.S.C. § 1441(a). This District and Division constitute the appropriate forum to which this action should be removed. The Harrison Circuit Court is within the New Albany Division.

10. Venue is vested in this Court pursuant to 28 U.S.C. § 1391 since this is a civil action where jurisdiction is founded on diversity of citizenship and the events complained of occurred in the Southern District of Indiana.

11. Pursuant to 28 U.S.C. § 1446(b), removal must be filed within thirty days after receipt of the initial pleadings setting forth the claim for relief.

12. The Notice tendered herewith is being filed on December 11, 2020, within thirty days of the receipt of Plaintiff's Complaint, which was originally filed on November 17, 2020, thus making removal timely.

13. Written notice of the filing of this Notice of Removal, the exhibits thereto, the Notice and Certificate were mailed to Plaintiff's counsel as of the date of this filing.

14. True and correct copies of the pleadings enumerated were filed with the Clerk of the Harrison Circuit Court as of the date of this filing.

**WHEREFORE**, Defendants, request the removal of this action from the Harrison Circuit Court to this Court for all other appropriate procedures.

Respectfully submitted,

WALTERS RICHARDSON, PLLC

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COUNSEL FOR DEFENDANTS

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing was filed electronically on this 11<sup>th</sup> day of December, 2020. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Joshua J. Leckrone

COUNSEL FOR DEFENDANTS

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